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Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

FRANCISCA T. SALAZAR,
Plaintiff,

v

C R BARD INCORPORATED, et al
Defendants,

Case No. 2:19-cv-02225-RFB-EJY

**STIPULATION AND [PROPOSED]
ORDER TO STAY DISCOVERY
AND ALL PRETRIAL DEADLINES
IN LIGHT OF SETTLEMENT
(THIRD REQUEST)**

Plaintiff Francisca T. Salazar (“Plaintiff”) and Defendants C. R. Bard Inc. and Bard Peripheral Vascular Inc. (“Defendants”) (collectively “the Parties”) hereby notifies the Court that the Parties have reached a full settlement in principle in this action.

Additionally, the Parties request this Court to approve this stipulation to stay this case for 90 days. Plaintiff’s counsel in this matter represents hundreds of plaintiffs with cases proceeding in this and other courts across the country. Plaintiff’s counsel and Defendants have reached a global settlement in principle regarding the Plaintiff’s counsel’s inventory of filed Bard IVC filter cases, including this matter. The parties are working to

1 finalize settlement documents and Plaintiff will dismiss the Complaint in this action when
 2 the settlement is finalized. Given that this settlement is being structured as a global
 3 settlement involving hundreds of other cases, the parties expect that it will take at least 90
 4 days, if not more, to memorialize and execute the specific terms of the settlement.

5 Accordingly, the parties request that the Court enter a stay of this case for 90 days
 6 pending Plaintiff's voluntary dismissal of all claims. If Plaintiff has not filed dismissal
 7 papers within 90 days from the stay being granted, the parties respectfully request the
 8 opportunity to file a joint status report regarding the status of the settlement.

9 **IT IS SO STIPULATED AND AGREED.**

10 DATED: this 21st day of September

12 DALIMONTE RUEB STOLLER, LLP

GREENBERG TRAURIG, LLP

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Counsel for Defendants

23 *Counsel for Plaintiffs*

[PROPOSED] ORDER

Upon consideration of the Parties' Stipulation To Stay Discovery And All Pretrial Deadlines In Light of Settlement , and for good cause appearing, IT IS HEREBY ORDERED that the Parties' stipulation is APPROVED, and all deadlines including Plaintiff's deadline to file a response to Defendants motion to dismiss hereby stayed and extended for 90 days to allow the Parties to finalize settlement and file dismissal papers.

IT IS SO ORDERED

DATED: September 29 , 2020



HON. RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on **September 21, 2020**, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive such service:

By: /s/Gregory D. Rueb